

H. Wallace



COPY FOR YOUR  
INFORMATION

March 4, 2011

Dr. Thomas K. Harden  
Chancellor  
University of Wisconsin-Green Bay  
2420 Nicolet Drive  
Green Bay, WI 54311-7001

**Certified Mail**  
**Return Receipt Requested**  
7008 0150 0003 0159 1486

**RE: Final Program Review Determination (FPRD)**  
**OPE ID: 00389900**  
**PRCN: 200930527079**


Dear Chancellor Harden:

The U.S. Department of Education (the Department) issued a program review report (PRR) on July 1, 2010 regarding the University of Wisconsin-Green Bay's (UWGB; the University) administration of programs authorized pursuant to Title IV of the Higher Education Act of 1965, as amended, 20 U.S.C. §§ 1070 et seq. (Title IV, HEA programs). This program review focused solely on the University's compliance with the requirements of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act. UWGB's response to the PRR was received on July 30, 2010. A copy of the program review report and UWGB's response are attached. Any supporting documentation submitted with the response is being retained by the Department and is available for inspection by UWGB upon request. Additionally, this Final Program Review Determination and any supporting documentation may be subject to release under the Freedom of Information Act and may be provided to other oversight entities after this FPRD is issued.

**Purpose:**

A final determination has been made concerning the sole finding identified during the program review. Information regarding final disposition of this violation is detailed in the attached FPRD. The purpose of this letter is to advise the University of the Department's final determinations and to close the review.

Federal Student Aid - School Participation Team - NW  
500 W. Madison St., Room 1576  
Chicago, IL 60661  
[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)

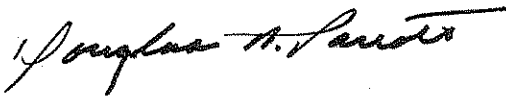
FEDERAL STUDENT AID  START HERE. GO FURTHER.

**Record Retention:**

Program records relating to the period covered by this program review must be retained until the later of: resolution of the violations, weakness, and other issues identified during the program review or the end of the retention period applicable to all Title IV-related records including campus crime and security documents under 34 C.F.R. § 668.24 (e)(1) and (e)(2).

We would like to express our appreciation for the courtesy and cooperation shown to us throughout the program review process. If you have any questions about this FPRD or the program review process, please contact Mr. Herschel D. Wallace on (312) 730-1537.

Sincerely,



Douglas A. Parrott  
Area Case Director

cc: Mr. Randy Christopherson, Director of Public Safety and Chief of Police, UWGB  
Mr. Ronald R. Ronnenberg, Director of Financial Aid and Student Employment, UWGB  
North Central Association of Colleges and Schools - Higher Learning Commission

Attachment as Stated



START HERE  
GO FURTHER  
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Prepared for:

University of Wisconsin - Green Bay

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OPE ID: 00389900

PRCN: 200930527079

Prepared by:

U.S. Department of Education

Federal Student Aid

School Participation Team – Chicago

Final Program Review Determination Letter  
March 4, 2011

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Appendix A: Program Review Report

Appendix B: University's Response

**A. Institutional Information**

**University of Wisconsin-Green Bay**  
**2420 Nicolet Drive**  
**Green Bay, WI 54311-7001**

**Type:** Public

**Highest Level of Offering:** Doctor's Degree

**Accrediting Agency:** North Central Association of Colleges and Schools-CIHE

**Current Student Enrollment:** 6,286 (Fall 2008)

**% of Students Receiving Title IV:** 77% (2007-2008)

**Title IV Participation - 2007-2008 Award Year):**

Federal Pell Grant Program	\$3,474,845.00
Federal Family Education Loan Program Stafford Subsidized	\$8,301,971.00
Federal Family Education Loan Program Stafford Unsubsidized	\$7,412,511.00
Federal Family Education Loan Program PLUS	\$1,314,779.00
Federal Work Study	\$ 327,480.00
Federal Perkins Loan	\$ 974,316.00
Federal Supplemental Educational Opportunity Grant	\$ 599,600.00
Academic Competitiveness Grant	\$ 187,925.00
National SMART Grant	\$ 86,000.00

<b>FFEL/DL Default Rate:</b>	2007:	1.2%
	2006:	.5%
	2005	.8%

<b>Perkins Default Rate:</b>	As of:	
	6/30/07:	2.1%
	6/30/06:	.4%
	6/30/05:	2.4%

Founded in 1965, the University of Wisconsin-Green Bay (UWGB; the University) focuses on preparing undergraduates for careers and further educational opportunities as a member of the University of Wisconsin System. Situated on the northeast border of the city, the UWGB enrolls about 6,300 students, about 40% of whom live on-campus. The UWGB Office of Public Safety utilizes both sworn law enforcement and security personnel to protect and serve the campus community. The Office of Public Safety has officers on duty 24-hours a day, seven days a week. Under Wisconsin state law, all UWGB police officers must meet the criteria of the Wisconsin Law Enforcement

Standards Board and have the power to arrest and bring before the courts any person found violating the law on University property. The UWGB police officers also conduct investigations and provide a full range of public safety services. The UWGB cooperates with other state, county, and local agencies to help ensure the safety of all University students and employees. Mutual agreements with other law enforcement agencies extend the jurisdiction of the UWGB police officers beyond campus boundaries.

## **B. Scope of Review**

The U.S. Department of Education conducted a program review at the UWGB from May 5, 2009 to May 7, 2009. The review was conducted by Mr. Herschel D. Wallace, III, Ms. Dianne Mickey and Mr. James L. Moore, III.

The focus of the review was to evaluate UWGB's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The Clery Act appears in Section 485(f) of the Higher Education Act of 1965, as amended (HEA), 20 U.S.C. § 1092(f). The Department's implementing regulations can be found at 34 C.F.R. § 668.41-668.46. UWGB was selected from a list of all institutions of higher education in the state of Wisconsin with sworn police departments and was not the result of any specific complaint or allegation of non-compliance.

The Department's program review coincided with the Quality Assurance Review that the Federal Bureau of Investigation's Criminal Justice Information Service (CJIS) Audit Unit conducted at UWGB. The U.S. Department of Education is partnering with the CJIS Audit Unit to ensure more accurate crime reporting on America's college campuses.

Our program review report was issued on July 1, 2010.

## **Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning UWGB's specific policing and campus security practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve UWGB of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs including the Clery Act.

## **C. Findings**

During the review, one finding of noncompliance was identified. The finding identified in the Department's July 1, 2010 program review report appears as written and is in italics below. At the conclusion of the finding is a summary of UWGB's response and the Department's final determination.

**Finding # 1: Failure to Properly Classify and Disclose Crime Statistics**

**Citation:**

Under the Clery Act and the Department's implementing regulations, participating institutions must compile and publish statistics concerning the occurrence on campus of the following incidents: criminal homicide, manslaughter, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. In addition, the institution is required to disclose arrests and disciplinary actions related to certain violations of Federal or state drug, liquor and weapons laws. 34 C.F.R. § 668.46(c)(1) and (7). The Department's regulations require that, for Clery Act reporting purposes, participating institutions must compile crime statistics using the definitions of crimes in Appendix A to Subpart D of Section 668 of the General Provisions Regulations.

**Noncompliance:**

The UWGB failed to: (1) properly classify three reported incidents that occurred in 2007; (2) include in its crime statistics for 2007 an incident that met the requirements for inclusion; and (3) publish accurate arrest and disciplinary referral statistics for calendar year 2007. The following discrepancies were noted:

Incident # 07-1044 was improperly classified as "Disorderly Conduct." The incident report chronicles several instances wherein the co-complainants (Roommate #1 and Roommate #2) were "subject to physical and verbal abuse" as a result of "several confrontations" with their third roommate (Assailant). The reported incidents occurred throughout September and October 2007. During one of these incidents, the Assailant used a knife to enter into Roommate # 1's room. Roommate # 2 told the Assailant to put the knife away, and tried to take it from her. The Assailant then took the knife and backed Roommate # 2 into a corner of the room while waving the knife at her. Roommate # 2 was able to escape the Assailant, retreat to her room, and lock the door. Based on the reported facts, this incident should have been classified as an Aggravated Assault, and included in the University's crime statistics for 2007. An aggravated assault does not require that the assault result in any bodily injury in those cases where a weapon is used.

Incident #s 07-238 and 07-337 were improperly classified as "Theft Offenses." Both cases involved the unlawful taking of money, personal property, and University property from offices in the American Intercultural Center (AIC). In the first case, a small amount of cash belonging to an employee and compact discs and CD covers belonging to the University were taken. The employee stated that he locked the office at the end of the day. The following day, he found the door unlocked and the items missing. There is no indication in the report that anyone had legal access to or permission to remove items from the office. The employee could not identify any likely suspects. In the second incident, which occurred approximately three weeks later in the AIC, a cash box containing \$630.00 was taken from a locked file cabinet in a locked office. Upon

*reporting to work, the employee immediately noticed that the drawers of her file cabinet were open. She immediately checked the drawer where the cash box was stored and found that it was missing. She was able to list the persons who had keys or access to keys but could not identify any suspects. On the facts contained in the incident reports, these offenses should have been classified as Burglary-Unlawful Entry-No Force, and included in the University's crime statistics for 2007.*

*Incident # 07-1261 was classified properly as Burglary, but the UWGB failed to disclose the crime in its campus crime statistics for 2007. The University's audit trail does not indicate that this incident, which occurred in the Studio Arts Building at 2460 North Circle Drive, was included in the annual security report's compilation of campus crime statistics.*

*The UWGB did not accurately report the number of arrests and disciplinary referrals for calendar year 2007. The review team noted discrepancies in the number of arrest and disciplinary referrals the UWGB disclosed in its Annual Security Report (ASR) for 2007, when compared to the number of arrests and disciplinary referrals provided to the review team by the University's staff. Specifically, liquor law (LL) and drug law (DL) arrests were overstated and disciplinary referrals for DL were understated. The UWGB's ASR indicated that 168 LL arrests, 11 DL arrests, and five disciplinary referrals (DR) were made; however, only 111 LL arrest and five DL arrests were identified from the documentation provided to the review team. With regard to disciplinary referrals, six DL referrals could were identified from the supporting documents.*

*Failure to properly classify incidents of crime and accurately disclosed campus crime statistics deprive the campus community of important security information.*

**Required Action:**

*In response to this finding, the UWGB may provide any additional documentation on Incident #s 07-1044, 07-238, and 07-337 that would verify the incidents were, in fact, properly classified as "Disorderly Conduct" and "Theft Offenses." Otherwise, the UWGB must reclassify these incidents as aggravated assaults and burglary, as appropriate. The UWGB must also resolve the discrepancy in the number of arrests and disciplinary referrals made during the year, and modify its 2007ASR campus crime statistics accordingly. Corrections must be made to the Department's web site database, the University's web site, and on the annual security report the UWGB provides to its students and staff. To correct the campus crime statistics on the Department's web site, the UWGB should call the Campus Crime helpdesk at 1-800-435-5985.*

*In addition, the UWGB must examine its policies, procedures, internal controls, and training programs to ensure that all incidents of crime reported to the campus police or a campus security authority are classified properly and included in the ASR's campus crime statistics. A copy of the corrected/modified ASR for 2007 as well as all new or revised policies and procedures must be submitted with the University's response.*



*Based on an evaluation of all available information including the UWGB's response, the Department will determine if additional actions are appropriate and advise the University accordingly in our Final Program Review Determination letter.*

### **Final Determination – Finding #1**

Finding # 1 of the program review report cited UWGB for classification and disclosure errors in its crime statistics for calendar year 2007. The violation had three components: 1) improper classification of three incidents of crime; 2) one occurrence of underreporting; and, 3) multiple discrepancies in its arrest and disciplinary referral statistics. As a result of these exceptions, one aggravated assault, three burglaries, and one liquor law arrest were omitted improperly from the University's crime statistics. Additionally, reporting discrepancies and recordkeeping weaknesses resulted in UWGB's statistics for liquor and drug law violation drug arrests and disciplinary referrals to be over-reported in some cases and under-reported in others.

As a result of this finding, the University was required to make all necessary corrections to its crime statistics and to revise its ASR accordingly and redistribute the report to all current students and employees. UWGB was also required to attempt to effect corrections to the statistics that were submitted to the Department's online campus crime database. Finally, the program review report mandated a comprehensive review of the University's Clery Act compliance operations including all relevant policies, procedures, internal controls, and training programs and to take all other necessary corrective action to ensure that this violation does not recur.

In its response, UWGB concurred with the classification, under-reporting, and discrepant information components of the finding and stated that it has corrected its calendar year 2007 crime statistics accordingly. The response claims that UWGB officials contacted the Department's campus crime helpdesk in an attempt to correct the data submitted to the online campus crime database. The response asserts that the helpdesk staff person advised that no revisions could be made to calendar year 2007 data at that time. Because the actual statistical grids could not be modified, the response claims that the correct statistical information was entered into the caveat fields in an attempt to comply with the program review report's requirements.

The review team has examined the corrected calendar year 2007 statistics as published in the University's 2010 ASR as well as the caveats entered into the online database and confirmed that corrective action was taken. As required, UWGB's response provided detailed information on several elements of its corrective action plan. Firstly, the Office of Public Safety has established a monthly internal review process designed to ensure the accuracy and completeness of its crime statistics for both UCR and Clery Act purposes. The University also has procured and implemented a new student conduct records management system. UWGB claims that this system along with certain policy and procedural changes will better align work flow and result in more accurate offense

classifications and provide clear information to be used in the statistical reconciliation process.

If fully implemented and sustained, UWGB's corrective actions should be adequate to address this violation and should improve overall compliance with the Clery Act going forward. As such, The Department accepts UWGB's response and considers this finding to be closed.



July 1, 2010

Dr. Thomas K. Harden  
Chancellor  
University of Wisconsin-Green Bay  
2420 Nicolet Drive  
Green Bay, WI 54311-7001

Certified Mail  
Return Receipt Requested  
7006 3450 0001 1491 2126

RE: **Program Review Report**  
OPE ID: 00389900  
PRCN: 200930527079

Dear Dr. Harden:

From May 5, 2009 through May 7, 2009, Herschel D. Wallace, III, Dianne Mickey and James L. Moore, III, of the U.S. Department of Education (Department) conducted a review of the University of Wisconsin-Green Bay's (the UWGB) administration of the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act) included in Section 485(f) of the Higher Education Act of 1965, as amended (HEA), 20 U.S.C. § 1092(f) and the Department's implementing regulations in 34 C.F.R. §§ 668.41 - 668.46. The findings of that review are presented in the enclosed report.


Findings of noncompliance are referenced to the applicable statutes and regulations and specify the actions required to comply with the statute and regulations. Please review the report and respond to each finding, indicating the corrective actions taken by the UWGB. The response should include a brief, written narrative for each finding that clearly states the UWGB's position regarding the finding and the corrective action taken to resolve the finding. Separate from the written narrative, the UWGB must provide supporting documentation as required in each finding. Please submit your response directly to Mr. Herschel D. Wallace, III, of this office within 30 calendar days of the receipt of this letter.

Please note that pursuant to HEA section 498A(b), the Department is required to:

- (1) provide to the institution an adequate opportunity to review and respond to any preliminary program review report<sup>1</sup> and relevant materials related to the report before any final program review report is issued;
- (2) review and take into consideration an institution's response in any final program review report or audit determination, and include in the report or determination:

<sup>1</sup> A "preliminary" program review report is the program review report. The Department's final program review report is the Final Program Review Determination (FPRD).

School Participation Team NW - Chicago  
500 West Madison Street, Suite 1576, Chicago, Illinois 60661  
[www.FederalStudentAid.ed.gov](http://www.FederalStudentAid.ed.gov)  
1-800-4-FED-AID

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- a. A written statement addressing the institution's response;
- b. A written statement of the basis for such report or determination; and
- c. A copy of the institution's response.

The Department considers the institution's response to be the written narrative (to include e-mail communication). Any supporting documentation submitted with the institution's written response will not be attached to the FPRD. However, it will be retained and made available for inspection by the UWGB upon request. Copies of the program review report, the institution's response, and any supporting documentation may be subject to release under the Freedom of Information Act (FOIA) and can be provided to other oversight entities after the FPRD is issued.

Please be sure that your response conforms to the Department's standards for the protection of Personally Identifiable Information (PII). PII is any information about an individual which can be used to distinguish or trace an individual's identity (some examples are name, social security number, date and place of birth). Please review the enclosure entitled "Protection of Personally Identifiable Information" for further guidance.

Program records relating to the period covered by this program review must be retained until the later of: resolution of the violations, weakness, and other issues identified during the program review or end of the applicable retention period under 34 C.F.R. § 668.24 (e)(1) and (e)(2).

We would like to express our appreciation for the courtesy and cooperation extended during the review. Please refer to the above Program Review Control Number (PRCN) in all correspondence relating to this report. If you have any questions concerning this report, please contact Herschel D. Wallace, III, at (312) 730-1537 or [herschel.wallace@ed.gov](mailto:herschel.wallace@ed.gov).

Sincerely,



Earl Flurkey  
Team Leader  
Chicago School Participation Team

Attachments & Enclosures as Stated

cc: Randy Christopherson, Director of Public Safety and Chief of Police  
Ron Ronnenberg, Financial Aid Administrator

Prepared for

**University of Wisconsin-  
Green Bay**

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START HERE  
GO FURTHER  
FEDERAL STUDENT AID

OPE ID 00389900

PRCN 200930527079

Prepared by

**U.S. Department of Education**

**Federal Student Aid**

**School Participation Team - Chicago**

# Program Review Report

July 1, 2010

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**A. Institutional Information**

University of Wisconsin-Green Bay  
2420 Nicolet Drive  
Green Bay, WI 54311-7001

Type: Public

Highest Level of Offering: Doctor's Degree

Accrediting Agency: North Central Association of Colleges and Schools-CIHE (Higher Educ)

Current Student Enrollment: 6,286 (Fall 2008)

% of Students Receiving Title IV: 77% (2007-2008)

**Title IV Participation PCNet Summary Funding Report:**

	2007-2008
Federal Pell Grant Program	\$3,474,845.00
Federal Family Education Loan Program Stafford Subsidized	8,301,971.00
Federal Family Education Loan Program Stafford Unsubsidized	7,412,511.00
Federal Family Education Loan Program PLUS	1,314,779.00
Federal Work Study	327,480.00
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Default Rate FFEL/DL: (2007):1.2%  
(2006): .5%  
(2005) .8%

Default Rate Perkins: (2007):2.1%  
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Founded in 1965, the University of Wisconsin-Green Bay (the UWGB; the University) focuses on preparing undergraduates for careers and further educational opportunities as a member of the University of Wisconsin System. Situated on the northeast border of the city, the UWGB enrolls about 6,300 students, about 40% of whom live on-campus. The UWGB Office of Public Safety utilizes both sworn law enforcement and security personnel to protect and serve the campus community. The Office of Public Safety has

officers on duty 24-hours a day, seven days a week. Under Wisconsin state law, all UWGB police officers must meet the criteria of the Wisconsin Law Enforcement Standards Board and have the power to arrest and bring before the courts any person found violating the law on University property. The UWGB police officers also conduct investigations and provide a full range of public safety services. The UWGB cooperates with other state, county, and local agencies to help ensure the safety of all University students and employees. Mutual agreements with other law enforcement agencies extend the jurisdiction of the UWGB police officers beyond campus boundaries.

### **B. Scope of Review**

The U.S. Department of Education (the Department) conducted a program review at the UWGB from May 5, 2009 to May 7, 2009. The review was conducted by Mr. Herschel D. Wallace, III, Ms. Dianne Mickey and Mr. James L. Moore, III.

The focus of the review was to evaluate the UWGB's compliance with the Jeanne Clery Disclosure of Campus Security Policy and Campus Crime Statistics Act (Clery Act). The Clery Act is in Section 485(f) of the Higher Education Act of 1965, as amended (HEA), 20 U.S.C. § 1092(f). The Department's implementing regulations are at 34 C.F.R. § 668.41-668.46. The UWGB was selected from a sample of institutions of higher education with sworn police departments; the result of any specific complaint or allegation of non-compliance. The review consisted of an examination of the UWGB's catalog and written agreements, police incident reports, arrest records and disciplinary files, as well as policies, practices and procedures related to the Clery Act. The review also included a comparison of the campus statistics submitted by the UWGB to the Department and reported to students and employees. Staff interviews of institutional officials with Clery Act responsibilities were also conducted.

The Department's program review coincided with the Quality Assurance Review (QAR) that the Federal Bureau of Investigation (FBI)'s Criminal Justice Information Service (CJIS) Audit Unit conducted at UWGB. The U.S. Department of Education is partnering with the CJIS Audit Unit (CAU) to ensure more accurate crime reporting on America's college campuses. The CAU reviews law enforcement agencies' reporting practices and audits crime statistics that are reported by the states through their participation in the Uniform Crime Reporting (UCR) program. The results of the QAR are shared with the Department for a comparative analysis of the annual security report data received from participating institutions. The CAU reviewed a total of 50 Part I Offenses and 50 Part II Offenses that were recorded from January 1, 2008 through December 31, 2008. A copy of the CJIS report is attached as Appendix A. During the CAU reviewed, no instances of non-compliance were identified. As such, no further action is required as it relates to the QAR.



The Department reviewed a sample of 53 campus police incident reports and 52 arrest and disciplinary reports from calendar year 2007. The judgmental sample was selected from: 1) a list of all incidents of crime reported to the UWGB Office of Public Safety or other campus security authority and 2) a list of all arrests and disciplinary referrals for law violations involving alcohol, illegal drugs, illegal usage of controlled substances, and weapons offenses during 2007. Approximately 18 incident reports were cross-checked against the daily crime log to ensure that crimes occurring within the patrol jurisdiction were entered properly on the log.

**Disclaimer:**

Although the review was thorough, it cannot be assumed to be all-inclusive. The absence of statements in the report concerning the UWGB's specific practices and procedures must not be construed as acceptance, approval, or endorsement of those specific practices and procedures. Furthermore, it does not relieve the UWGB of its obligation to comply with all of the statutory or regulatory provisions governing the Title IV, HEA programs.

This report reflects initial findings. These findings are not final. The Department will issue its final findings in a subsequent Final Program Review Determination letter.

**C. Findings**

During the review, one area of noncompliance was noted. The Finding of noncompliance is referenced to the applicable statutes and regulations and specifies the actions to be taken by the UWGB to bring operations into compliance with the statutes and regulations.

**Finding # 1: Failure to Properly Classify and Disclose Crime Statistics**

**Citation:**

Under the Clery Act and the Department's implementing regulations, participating institutions must compile and publish statistics concerning the occurrence on campus of the following incidents: criminal homicide, manslaughter, forcible and non-forcible sex offenses, robbery, aggravated assault, burglary, motor vehicle theft, and arson. In addition, the institution is required to disclose arrests and disciplinary actions related to certain violations of Federal or state drug, liquor and weapons laws. 34 C.F.R. § 668.46(c)(1) and (7). The Department's regulations require that, for Clery Act reporting purposes, participating institutions must compile crime statistics using the definitions of crimes in Appendix A to Subpart D of Section 668 of the General Provisions Regulations.

**Noncompliance:**

The UWGB failed to: (1) properly classify three reported incidents that occurred in 2007; (2) include in its crime statistics for 2007 an incident that met the requirements for inclusion; and (3) publish accurate arrest and disciplinary referral statistics for calendar year 2007. The following discrepancies were noted:

Incident # 07-1044 was improperly classified as "Disorderly Conduct." The incident report chronicles several instances wherein the co-complainants (Roommate #1 and Roommate #2) were "subject to physical and verbal abuse" as a result of "several confrontations" with their third roommate (Assailant). The reported incidents occurred throughout September and October 2007. During one of these incidents, the Assailant used a knife to enter into Roommate # 1's room. Roommate # 2 told the Assailant to put the knife away, and tried to take it from her. The Assailant then took the knife and backed Roommate # 2 into a corner of the room while waving the knife at her. Roommate # 2 was able to escape the Assailant, retreat to her room, and lock the door. Based on the reported facts, this incident should have been classified as an *Aggravated Assault*, and included in the University's crime statistics for 2007. An aggravated assault does not require that the assault result in any bodily injury in those cases where a weapon is used.

Incident #s 07-238 and 07-337 were improperly classified as "Theft Offenses." Both cases involved the unlawful taking of money, personal property, and University property from offices in the American Intercultural Center (AIC). In the first case, a small amount of cash belonging to an employee and compact discs and CD covers belonging to the University were taken. The employee stated that he locked the office at the end of the day. The following day, he found the door unlocked and the items missing. There is no indication in the report that anyone had legal access to or permission to remove items from the office. The employee could not identify any likely suspects. In the second incident, which occurred approximately three weeks later in the AIC, a cash box containing \$630.00 was taken from a locked file cabinet in a locked office. Upon reporting to work, the employee immediately noticed that the drawers of her file cabinet were open. She immediately checked the drawer where the cash box was stored and found that it was missing. She was able to list the persons who had keys or access to keys but could not identify any suspects. On the facts contained in the incident reports, these offenses should have been classified as *Burglary-Unlawful Entry-No Force*, and included in the University's crime statistics for 2007.

Incident # 07-1261 was classified properly as *Burglary*, but the UWGB failed to disclose the crime in its campus crime statistics for 2007. The University's audit trail does not indicate that this incident, which occurred in the Studio Arts Building at 2460 North Circle Drive, was included in the annual security report's compilation of campus crime statistics.

The UWGB did not accurately report the number of arrests and disciplinary referrals for calendar year 2007. The review team noted discrepancies in the number of arrest and disciplinary referrals the UWGB disclosed in its Annual Security Report (ASR) for 2007, when compared to the number of arrests and disciplinary referrals provided to the review team by the University's staff. Specifically, liquor law (LL) and drug law (DL) arrests were overstated and disciplinary referrals for DL were understated. The UWGB's ASR indicated that 168 LL arrests, 11 DL arrests, and five disciplinary referrals (DR) were made; however, only 111 LL arrest and five DL arrests were identified from the documentation provided to the review team. With regard to disciplinary referrals, six DL referrals were identified from the supporting documents.

Failure to properly classify incidents of crime and accurately disclosed campus crime statistics deprive the campus community of important security information.

**Required Action:**

In response to this finding, the UWGB may provide any additional documentation on Incident #s 07-1044, 07-238, and 07-337 that would verify the incidents were, in fact, properly classified as "Disorderly Conduct" and "Theft Offenses." Otherwise, the UWGB must reclassify these incidents as aggravated assaults and burglary, as appropriate. The UWGB must also resolve the discrepancy in the number of arrests and disciplinary referrals made during the year, and modify its 2007 ASR campus crime statistics accordingly. Corrections must be made to the Department's web site database, the University's web site, and on the annual security report the UWGB provides to its students and staff. To correct the campus crime statistics on the Department's web site, the UWGB should call the Campus Crime helpdesk at 1-800-435-5985.

In addition, the UWGB must examine its policies, procedures, internal controls, and training programs to ensure that all incidents of crime reported to the campus police or a campus security authority are classified properly and included in the ASR's campus crime statistics. A copy of the corrected/modified ASR for 2007 as well as all new or revised policies and procedures must be submitted with the University's response.

Based on an evaluation of all available information including the UWGB's response, the Department will determine if additional actions are appropriate and advise the University accordingly in our Final Program Review Determination letter.